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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC
and the estate of Bernard L. Madoff,

Plaintiff,

v.

NATIXIS, NATIXIS CORPORATE &
INVESTMENT BANK (f/k/a IXIS CORPORATE
& INVESTMENT BANK), NATIXIS
FINANCIAL PRODUCTS, INC., BLOOM
ASSET HOLDINGS FUND, AND TENSYR
LIMITED,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05353 (SMB)

**APPELLEE TENSYR LIMITED'S
COUNTER-DESIGNATION OF AN
ADDITIONAL ITEM TO BE
INCLUDED IN THE RECORD ON
APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Tensyr Limited. ("Tensyr"), by and through its undersigned counsel, respectfully

submits the following counter-designation of an additional item to be included in the record on appeal (the “Counter-Designation”) in response to the Trustee’s Statement of Issues to be Presented and Designation of Items to be Included in the Record on Appeal, dated March 28, 2017 [Dkt. No. 132], submitted by Irving H. Picard (the “Trustee”), as trustee of the substantively consolidated estate of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa, et seq., and Bernard L. Madoff, individually.

I. COUNTER-DESIGNATION OF AN ADDITIONAL ITEM TO BE INCLUDED IN THE RECORD ON APPEAL

Tensyr hereby counter-designates the following additional item to be included in the record on appeal. Tensyr reserves its right to designate additional items for inclusion in the record. For the item designated, the designation includes all documents referenced with the particular document number including, without limitation, all statements, appendices, exhibits, attachments, declarations, and affidavits related thereto.

Item No.	Date	ECF No. (08-01789)	Docket Text
1	4/8/2016	13070	<i>Letter on Behalf of the Subsequent Transferee Defendants in Response to Mr. Sheehans Letter dated April 7, 2016</i> (related document(s)13051) Filed by Franklin B. Velie on behalf of Bank Austria Worldwide Fund Management Ltd.. (Velie, Franklin)

Dated: New York, New York
April 11, 2017

FRESHFIELDS BRUCKHAUS DERINGER US LLP

By: /s/ David Y. Livshiz
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